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January 30, 2015

Hon. Shira Scheindlin
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: SEC v. Adondakis, et al., Civ. No. 12-0409 (SAS)

Dear Judge Scheindlin:

We represent Todd Newman in the above-captioned matter. We write on behalf of Mr. Newman to seek an additional stay of this matter. Mr. Newman's co-defendant, Anthony Chiasson, joins in this request through his counsel, Gregory Morvillo of Morvillo LLP.

As this Court knows, on December 10, 2014, Defendants Newman and Chiasson's convictions in the parallel criminal matter, United States v. Newman, et al., S2-12-cr-121 (RJS), were vacated. At that time, Defendants Newman and Chiasson moved to dismiss the summary judgment which had been entered in this matter and for a stay of this matter until January 30, 2015, pending the United States' decision on whether to seek further appellate review in the criminal matter. On January 23, 2015, the United States filed a petition for a panel rehearing and rehearing *en banc*. Defendants Newman and Chiasson then agreed with the Securities and Exchange Commission ("SEC") to seek a further stay of this matter pending the final outcome of appellate proceedings in the criminal matter. However, because Defendants Newman and Chiasson – who have been living with this matter in one form or another since late 2010 – have an interest in rapidly resolving the instant action following the termination of appellate proceedings in the criminal matter, Defendants Newman and Chiasson asked the SEC if it would agree to jointly seek an expeditious hearing of any dispositive motion Defendants Newman and Chiasson might make should their convictions remain vacated. The SEC agreed to do so.

We therefore respectfully request that this Court continue the stay of this matter until the final outcome of appellate proceedings in the criminal matter, and that the Court further allow the parties to seek an expedited hearing thereafter. As indicated, counsel for the SEC has informed us that they consent to this request.

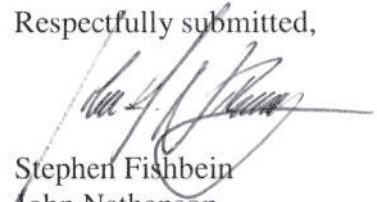
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Respectfully submitted,



Stephen Fishbein
John Nathanson
Attorneys for Todd Newman

Cc: Counsel for All Parties (via email)